

Message

---

**From:** Glass, Geoffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1EE3C5CD15504E5AA8660FCF60D2E04D-GGLASS]  
**Sent:** 8/9/2019 4:55:37 PM  
**To:** egui461@ecy.wa.gov  
**Subject:** Delegation Request  
**Attachments:** Ecology\_NESHAP\_2018\_EncA.docx; Ecology\_NESHAP\_2018\_EncB.docx; Ecology\_NSPS\_2018\_EncA.docx

This is something that I shared a while back. Since then, I have created these attachments with checkboxes that I use for delegations. If you like, you can check the boxes and refer to the attachments in your requests. If you do this, please either make a PDF of the attachment or deactivate the checkboxes in any electronic copies you send. I don't want to accidentally check/uncheck any boxes.

All recent requests have been addressed to the Director of the Air and Radiation Division. This is currently Krishna Viswanathan.

I prefer separate applications for NSPS (part 60) and NESHAP (part 61 and 63), though I will not return a combined request.

Each delegation submittal must include:

- The subparts for which you are requesting delegation. You may request (1) the subparts for which you *are* requesting delegation or (2) the subparts for which you *are not* requesting delegation or (3) you may state that you are requesting delegation of all delegable subparts. In addition, the effective date of the standards needs to be clear.
- A citation to the State (or local) regulation(s) that adopt the federal standards for which you are requesting delegation and a copy of the most recent update to said regulation(s).
- A reference to the initial delegation of authority in the Federal Register (this is not required for part 60 delegations). We can help you find this, if necessary. (66 FR 48211 (September 19, 2001))
- A statement that the initial delegation of authority has not changed. (This is likely the case if you are implementing an approved part 70 program.)
- For local agencies only, evidence that you have consulted with the State before submitting your delegation request to EPA.

See 40 CFR 63.90(b), 63.91(a), and (d)(2), and "Technical Assistance Document for the Submission of State/Local/Tribal Requests for Delegation and Approval of Alternatives to Section 112 Rules, Programs, or Requirements," which provides information on the "straight delegation" process (pp. 15-21).

If you wish to accept delegation of any subpart only under certain circumstances (e.g. for title V sources only, for permitted sources only), this needs to be clear in your request. (Often, State or local authorities accept delegation for area source standards in part 63 only when they apply to title V sources or permitted sources.)

Thanks for keeping your delegation requests up to date.

---

Geoffrey L. Glass, MSChE	US EPA Region 10
Regional Air Toxics Coordinator	1200 6 <sup>th</sup> Avenue, Suite 155, 15-H13
Pacific Northwest (AK, ID, OR, WA)	Seattle, WA 98101

206.553.1847 – [glass.geoffrey@epa.gov](mailto:glass.geoffrey@epa.gov) – [www.epa.gov](http://www.epa.gov)